

FILED

MAY 24 2013

**Board of Vocational Nursing
and Psychiatric Technicians**

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8 **BEFORE THE**
9 **BOARD OF VOCATIONAL NURSING AND**
10 **PSYCHIATRIC TECHNICIANS**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. VN-2010-683

14 **ANGELE MARIE JAVARAS**
15 **2330 Woolner Avenue**
16 **Fairfield, CA 94533**

A C C U S A T I O N

Vocational Nurse License No. VN 183909

Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in
21 her official capacity as the Executive Officer of the Board of Vocational Nursing & Psychiatric
22 Technicians.

23 2. On or about March 24, 1998, the Board issued Vocational Nurse License Number VN
24 183909 to Angele Marie Javaras (Respondent). The Vocational Nurse License was in full force
25 and effect at all times relevant to the charges brought herein and will expire on November 30,
26 2013, unless renewed.

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8. Respondent is subject to disciplinary action under sections 2878 (f) and 490 in that or about November 10, 2011, in the Solano County Superior Court, Case No. FCR 288049, Respondent was convicted by pleas of guilty to a violation of Health and Safety Code Section 11377 (a) (Possession of a Controlled Substance) and Penal Code Section 484 (a) (Theft). The circumstances are as follows:

9. On or about September 16, 2011 Respondent entered a Sears store retail establishment with an empty bag. Respondent then moved about the retail store placing several items in her bag. Respondent subsequently departed the premises without paying for the goods she had selected and placed in her bag. Respondent was later sentenced as follows:

- a. Three (3) years probation;
- b. Sixty (60) days in county jail;
- c. Jail fees and fines in the amount of \$315.00;
- d. Ordered to obtain counseling and therapy;
- e. Eight (8) hours of theft class counseling;
- f. And prohibited from contact with Sears, JC Penneys, and other stores of Solano Mall in Fairfield, California.

SECOND CAUSE FOR DISCIPLINE

(CRIMINAL CONVICTION)

10. Respondent is subject to disciplinary action under section 2878 (f) and 490 in that on or about November 10, 2011, in the Solana County Superior Court, Case No. FCR 278817, Respondent was convicted by plea of guilty to a violation of California Penal Code Section 484(a) (Stealing and carrying away personal property). The circumstances are as follows:

11. On or about August 27, 2010, Respondent entered a JC Penney retail establishment with an empty bag. Respondent then moved about the retail store placing several items in her bag. Respondent subsequently departed the premises without paying for the goods she had selected and placed in her bag.

DISCIPLINE CONSIDERATIONS

12. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant alleges that on or about March 22, 2010 in a prior action, the Board of Vocational Nursing & Psychiatric Technicians issued Citation Number 10-0037-L and ordered Respondent to pay a fine of \$500.00. The underlying circumstances were that Respondent had received a criminal conviction in Solano County Superior Court Case No. FCR260712, for a violation of Penal Code Section 487 (a). (Grand Theft). That Citation is now final and is incorporated by reference as if fully set forth.

13. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant alleges that on or about March 28, 2008, in a prior action, the Board of Vocational Nursing & Psychiatric Technicians issued Citation Number 08-0042-L and ordered Respondent to pay a fine of \$550.00. The underlying circumstances were that Respondent had received a criminal conviction in Sacramento County Municipal Court Case No. 05M05701, for a violation of Penal Code Section 243 (b). (Battery Against a Peace Officer). That Citation is now final and is incorporated by reference as if fully set forth.

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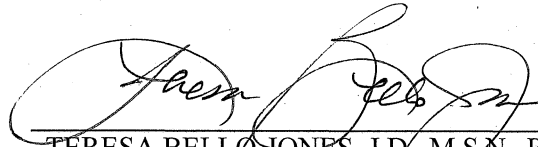
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Vocational Nurse License Number VN 183909, issued to Angele Marie Javaras;
2. Ordering Angele Marie Javaras to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Taking such other and further action as deemed necessary and proper.

DATED: May 24, 2013



TERESA BELLO-JONES, J.D., M.S.N., R.N.
Executive Officer
Board of Vocational Nursing & Psychiatric Technicians
State of California
Complainant

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